

**Items for Discussion in Navy's Responses to EPA Comments
on the Draft Parcel G Removal Site Evaluation Work Plan
Hunters Point Shipyard, San Francisco, California June 2018**

Red Flag Items

1. The Responses to EPA General Comment 9, and Specific Comments 16, and 19 state that Section 5 has been revised to require alpha spectroscopy for U-238, U-234, Th-230, and Ra-226 to evaluate the equilibrium status of the uranium natural decay series in order to assist in the comparison of Ra-226 results with background for all samples exceeding the RG and background. Dave – are you okay with this? GET All – no cost difference. Need all actinides (including Th-232) – same cost – would have to delete results to only report these radionuclides.

Response – will analyze and report all actinides. Error bars will determine on the sample.

2. The Response to EPA General Comment 12 - Donna
3. The Response to EPA General Comment 22 – Details should be provided about the characterization of the impact of erosion and runoff mentioned in this response as neither the Work Plan nor the SAP included this type of characterization.

Response – Navy should clarify response (no intent to do study to evaluate impact of erosion and concentration of Cs-137).

Items Requiring Clarification

1. The Response to EPA General Comment 2 states “For the building site SUs, because 100 percent surface scans were added for all TUs and SUs, the building site SUs will all be investigated consistently and concurrently and there are no longer phases for surface soil SUs.” However, the last sentence appears erroneous and may incorrectly reference soil SUs instead of building SUs. This should be clarified by the Navy.

Response: Intent – 100% remove asphalt, so all SUs will be scanned (no effective difference between Phase 1 and 2, so phase language removed).

2. The Responses to EPA General Comments 9 and 18 (a) state that the Navy conducted preliminary calculations of the risk using the USEPA's Preliminary Remediation Goal Calculator and found that the current RGs are within the risk management range of 10⁻⁴ to 10⁻⁶. RGs are not proposed to be changed as part of this work plan. Future protectiveness will be evaluated in the Five-Year Review.” This information will need to be confirmed, Lily??